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Honorable Christopher M. Alston
Chapter 11
Ex Parte

7
8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 In re:

12 NORTHWEST TERRITORIAL MINT, LLC,
13 Debtor.

Case No. 16-11767-CMA

TRUSTEE'S *EX PARTE* MOTION TO
ESTABLISH NOTICE PROCEDURES
FOR CASE DISMISSAL

14 Mark Calvert, the Chapter 11 Trustee (the "Trustee") respectfully requests that the Court
15 establish notice procedures with respect to the Trustee's forthcoming motion for an order dismissing
16 this Bankruptcy Case and granting related relief ("Dismissal Motion") pursuant to Federal Rules of
17 Bankruptcy Procedure 2002(a) and 9006 and LBR 9013-1(d)(3). In support of this Motion, the
18 Trustee respectfully states as follows:

19 1. On April 1, 2016, Northwest Territorial Mint, LLC (the "Debtor") filed a voluntary
20 bankruptcy petition under Chapter 11 of Title 11 of the United States Code. The Court ordered the
21 appointment of a trustee and the Chapter 11 Trustee, Mark Calvert, was appointed on April 11, 2016.

22 2. The Trustee is nearing the end of the administration of the case. The Trustee has
23 liquidated the vast majority of the assets of the estate. The Trustee has resolved and paid all secured
24 claims and all administrative claims other than allowed administrative claims for compensation of
25 the Trustee and his professionals.

26
TRUSTEE'S *EX PARTE* MOTION TO ESTABLISH
NOTICE PROCEDURES- 1

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3. The Trustee responded to document production subpoenas and testified at trial on July 26 and 27, 2021 in the criminal case of Ross Hansen and Diane Erdmann. The criminal case concluded on July 30, 2021.

4. The Trustee is prepared to file the Dismissal Motion.¹ At the status conference held by the Court on April 2, 2021, the Court indicated that it would consider whether a motion to dismiss should be noticed to the limited notice list or to the full mailing matrix. The estimated cost of service upon the full mailing matrix is \$3,500.

5. By this motion, the Trustee requests that the Court establish notice procedures and limit notice of the Motion to Dismiss to the Special Notice List as defined in the Amended Case Management Order (Dkt. 232). The Trustee will provide notice of the Motion to Dismiss in compliance with the time limitations provided in LBR 9013-1.

DATED this 5th day of August, 2021.

K&L GATES LLP

By /s/ Michael J. Gearin
Michael J. Gearin, WSBA #20982
David C. Neu, WSBA #33143
Brian T. Peterson, WSBA #42088
Attorneys for Mark Calvert, Chapter 11 Trustee

¹ The Trustee intends to note the hearing on the Motion to Dismiss for the Court's regularly scheduled calendar on September 24, 2021.

CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a paralegal in the law firm of K&L Gates LLP, and on August 5, 2021, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

Also on August 5, 2021, she caused the foregoing document to be mailed to the Parties at the addresses listed below:

Northwest Territorial Mint LLC
PO Box 2148
Auburn, WA 98071

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 5th day of August, 2021 at Lynnwood, Washington.

/s/ *Denise A. Lentz*
Denise A. Lentz

TRUSTEE'S *EX PARTE* MOTION TO ESTABLISH
NOTICE PROCEDURES- 3

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